

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

GEORGE PIO, Individually and on	)	
Behalf of All Other Persons	)	
Similarly Situated	)	Civil Action No. 2:14-cv-11191-
	)	RHC-MKM
Plaintiff,	)	
	)	Judge Robert H. Cleland
v.	)	Magistrate Judge Mona K. Majzoub
	)	
GENERAL MOTORS COMPANY,	)	
MARY T. BARRA, DANIEL	)	
AMMANN, ALAN S. BATEY,	)	
JAMES B. DELUCA, and	)	
DANIEL F. AKERSON	)	
	)	
Defendants,	)	
	)	

**AGREED MOTION FOR EXTENSION OF TIME**

Defendants hereby move for an extension of time to respond to Plaintiff's Complaint. In support of their motion, Defendants state as follows:

1. On March 21, 2014, Plaintiff filed a Complaint purporting to assert claims on his own behalf and on behalf of a class of all persons other than Defendants who purchased GM securities between November 17, 2010 and March 10, 2014, inclusive. (Dkt. No. 1)

2. On March 28, 2014, counsel for Plaintiff sent to counsel for Defendants, and counsel for Defendants executed, Waivers of Service that, pursuant to Federal Rule of Civil Procedure 4(d), provided that Defendants'

response to Plaintiff's Complaint would be due on May 27, 2014 (60 days from March 28, 2014). (Dkt. Nos. 2-7)

3. On May 20, 2014, four purported members of the class alleged in the Complaint filed motions for Appointment as Lead Plaintiff pursuant to 15 U.S.C. § 78u-4(a)(3)(B). (Dkt. Nos. 10-15)

4. The parties anticipate that the pending motions will result in the appointment of lead counsel and the filing of a consolidated class action complaint by such lead counsel.

5. In light of these developments, the parties agree that Defendants need not respond to the pending Complaint, and that the time for Defendants to respond to a consolidated complaint should be set in consultation with lead counsel after such lead counsel are appointed.

6. Defendants therefore request that the Court enter the attached Order, agreed to by Plaintiff, which extends the time for Defendants to respond to the Complaint until such time as the Court rules on any pending or future motions for Appointment of Lead Counsel and approves (or otherwise orders) a schedule for the filing of any Consolidated Complaint and any response thereto.

Dated: May 27, 2014

Respectfully submitted,

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of May, 2014, I electronically filed the foregoing paper(s) with the Clerk of the Court which will send notification of such filing.

Respectfully submitted,

/s/ Raymond W. Henney

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	)	
Defendants,	)	
	)	

**ORDER**

The Court, having considered Defendants' Agreed Motion for Extension of Time, hereby orders that the time for Defendants to respond to Plaintiff's Complaint (Dkt. #1) is hereby extended until such time as the Court rules on any pending or future motions for Appointment of Lead Counsel and approves (or otherwise orders) a schedule for the filing of any Consolidated Complaint and any response thereto.

\_\_\_\_\_  
Hon. Robert H. Cleland  
United States District Judge